

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MANASSEH R. SIMMONDS,

Plaintiff,

versus

NATIONAL OILWELL VARCO, L.P.,

Defendant.

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CIVIL ACTION NO. H-12-2109

JURY QUESTIONS

QUESTION NO. 1

Did Defendant take an adverse employment action against Plaintiff because Plaintiff engaged in protected activity?

Answer "Yes" or "No."

YES

If you answered "Yes" to Question No. 1, please proceed to Question No. 2. If you answered "No" to Question No. 1, do not answer any more questions. Please sign and date the Certificate and return it to the Court.

QUESTION NO. 2

What sum of money, if paid now in cash, would fairly and reasonably compensate Plaintiff for the damages, if any, you have found Defendant caused Plaintiff?

Answer in dollars and cents for the following items and none other:

Back pay and benefits:

\$ 675,000.00

Emotional pain and suffering, inconvenience, mental anguish, and loss of enjoyment of life:

\$100,000.00

Please proceed to question No. 3.

QUESTION NO. 3

Based on the evidence presented, do you find that Plaintiff should be awarded punitive damages?

Answer "Yes" or "No."

YES

If you answered "Yes" to Question No. 3, please proceed to Question No. 4. If you answered "No" to Question No. 3, do not answer any more questions. Please sign and date the Certificate and return it to the Court.

QUESTION NO. 4

What sum of money should be assessed against Defendant as punitive damages?

Answer in dollars and cents:

\$ 2,500,000.00

Please sign and date the Certificate and return it to the Court.

CERTIFICATE

We the jury, have made the above findings as indicated, and herewith return same into Court as our verdict.

SIGNED this the 16TH day of May, 2014, at Houston, Texas.


JURY/FOREPERSON